

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 23-cr-80219-AMC(s)

UNITED STATES OF AMERICA

v.

MICHAEL GORDON DOUGLAS,

Defendant.

GOVERNMENT'S SPEEDY TRIAL REPORT (TENTH)

The United States of America, by and through the undersigned Assistant United States Attorney, hereby files this Speedy Trial Report (Tenth). The Speedy Trial Act requires that a defendant's trial commence within seventy days from the latter of either the date of indictment or the date of the defendant's appearance before a judicial officer, and not fewer than thirty days from the date on which the defendant first appears through counsel. *See* 18 U.S.C. § 3161(c)(1), (c)(2).

Procedural History and Significant Dates

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|--|-----------------------------|
| 1. Defendant arrested on criminal complaint in SDCA: | 12/12/2023 |
| 2. Initial Indictment returned by Grand Jury in SDFL: | 12/19/23 |
| 3. Defendant's initial appearance and arraignment in SDFL: | 2/29/2024 ¹ |
| 4. Date that speedy trial began: | 3/1/2024² |
| 5. First motion to continue trial filed by defense (ECF No. 26): | 3/26/2024 ³ |

¹ 2024 was a leap year

² The speedy trial period began on March 1, 2024, which is the latter of two trigger events, that is, the day after his appearance and arraignment on February 29, 2024. *See United States v. Campbell*, 706 F.2d 1138, 1139 (11th Cir. 1983) (explaining that the triggering date is excluded from the Speedy Trial Act calculation).

³ Twenty-five (25) days passed between March 1, 2024 and March 26, 2024, which were not tolled.

- 6. Order continuing trial and tolling of speedy until 9/9/2024 (ECF No. 27): 4/1/2024**
7. Motion for medical examination (ECF No. 32): 4/9/2024
8. Motion for extension of time to file motions (ECF No. 40): 6/12/2024
9. Motions to suppress (ECF No.'s 46, 47 and 48): 7/5/2024
10. Superseding Indictment: 7/18/2024
11. Govt., Motion in Limine (ECF No. 62): 7/19/2024
12. Govt., Agreed Motion to continue trial (ECF No. 74): 7/29/2024
13. Defendant second Motion to continue trial (ECF No. 77): 8/5/2024
- 14. Second Order continuing trial and tolling of speedy trial period until 1/13/2025 (ECF No. 80): 8/6/2025**
15. Motion hearings before District Court: 8/12/2024
16. Defense counsel Motions to withdraw (ECF No.'s 97 and 98): 12/13/2024
17. Motion to appoint Federal Public Defender (ECF No. 99): 12/16/2024
- 18. Third Order continuing trial and tolling of speedy trial period until 2/10/2025 (ECF No. 101): 12/16/2024**
19. Unopposed Motion to continue trial by AFPD (ECF No. 110): 1/15/2025
- 20. Fourth Order continuing trial and tolling of speedy trial period until 5/5/2025 (ECF No. 112): 1/27/2025**
21. Motion to reconsider bond (ECF No. 114): 2/24/2025
22. Defendant's Motion in Limine (ECF No. 132): 4/28/2025

Speedy Trial Calculation

23. Total number of days between 3/1/2024 and 5/5/2025:	430 days
24. Total number of days not excluded from speedy trial period:	25 days
25. Total number of days excluded from speedy trial period:	405 days
26. Remaining days available after 5/5/2025, absent any additional period:	45 days
27. Last day trial must commence, absent any additional period of delay:	June 19, 2025

WHEREFORE, the United States submits this Tenth Speedy Trial Report and states that there have been 25 days of non-excludable time, leaving without any further tolling, a requirement that the defendant's trial begin on or before June 19, 2025.

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the

manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/Adam C. McMichael
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